

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Plaintiff Prison Legal News respectfully submits this Complaint for declaratory and injunctive relief ordering the U.S. Department of Homeland Security and Immigration and Customs Enforcement to comply with their legal obligations under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552 *et. seq.*

I. INTRODUCTION

1. In July 2013, Prison Legal News (“PLN”) submitted a written request under the FOIA for records held by Defendant Immigration and Customs Enforcement, a law enforcement component of the U.S. Department of Homeland Security (collectively, “ICE” or

1 “Defendants”). The requested records concern inmate telephone services and related issues at
 2 an ICE detention facility in Washington state. In violation of the FOIA, ICE has never
 3 responded to PLN’s request. To date, ICE has utterly failed its obligations under the FOIA (1)
 4 to respond to PLN’s request and (2) to provide the public records that PLN seeks. PLN
 5 requests that this Court order ICE to comply, enjoin ICE from further neglecting its duties
 6 under federal law, and reimburse PLN the legal fees and costs it has incurred in this action.

7 II. PARTIES

8 2. Plaintiff Prison Legal News (“PLN”) is a news publication with an office in
 9 Seattle, WA. PLN is a project of the Human Rights Defense Center (“HRDC”), a nonprofit,
 10 charitable corporation organized under the laws of the State of Washington and recognized as
 11 tax exempt under IRS Code § 501(c)(3). HRDC’s principal offices are in Lake Worth, FL. The
 12 core of HRDC’s mission is public education, prisoner education, advocacy, and outreach in support
 13 of the rights of prisoners and in furtherance of basic human rights.

14 3. Defendant United States Department of Homeland Security (“DHS”) was
 15 created through the integration of all or part of twenty-two federal departments and agencies
 16 into a unified, integrated Department. United States Immigration and Customs Enforcement is
 17 one of its components.

18 4. Defendant United States Immigration and Customs Enforcement (“ICE”) is the
 19 federal agency which serves as the investigative arm of DHS. ICE is responsible for certain
 20 immigration-related adjudications and benefits programs. ICE Enforcement and Removal
 21 Operations manages and oversees the federal government’s civil immigration detention system.

22 5. The Northwest Detention Center in Tacoma, WA, is a detention facility used by
 23 ICE to house detainees pending the removal process.

II. JURISDICTION AND VENUE

6. This Court has jurisdiction pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331 (federal question jurisdiction).

7. Venue lies properly in this Court pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1391 because a substantial part of the events giving rise to the claim occurred in this judicial district.

III. FACTUAL BACKGROUND

8. PLN is a legal journal that reports news concerning detention facilities and criminal justice issues. The purpose of PLN, as stated in PLN's Articles of Incorporation, Article 3, Part 6, is: "to educate prisoners and the public about the destructive nature of racism, sexism, and the economic and social costs of prison to society." Prisoners and their relatives, friends, and advocates benefit from PLN's activities.

9. PLN publishes and distributes a monthly periodical that reports and analyzes criminal justice news on a national level. Produced continuously since 1990, the publication has approximately 9,000 subscribers in 50 states, including lawyers, journalists, judges, courts, public libraries, and universities. Surveys indicate that PLN's readership is approximately ten times the subscriber number. PLN also maintains a listserv and a website at www.prisonlegalnews.org, which receives approximately 100,000 visitors per month, according to site analytics. PLN publishes books about the criminal justice system and legal issues for use by prisoners, lawyers, courts, libraries, and other members of the general public.

10. PLN is a “representative of the news media” within the meaning of 5 U.S.C. § 552(a)(4)(A)(ii) because it gathers information of current interest to the public, uses its editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience.

1 11. PLN's employees, articles, and advocacy activities (including its litigation) have
 2 been widely cited in mainstream media sources, including The New York Times, CNN, The
 3 Wall Street Journal, USA Today, The Nation, BusinessWeek, Mother Jones, the Miami Herald,
 4 the National Law Journal, The Atlanta Journal Constitution, The Sacramento Bee, the Boston
 5 Herald, The Washington Times, Columbia Journalism Review, Courthouse News Service, and
 6 the First Amendment Center.

7 12. HRDC is a 501(c)(3) non-profit corporation that advocates on behalf of the
 8 human rights of people held in detention facilities in the United States. The core of HRDC's
 9 mission is public and prisoner education, advocacy, and outreach in support of the rights of
 10 prisoners and in furtherance of basic human rights. In July 2013, the national Society of
 11 Professional Journalists awarded HRDC its annual First Amendment Award.

12 13. On July 30, 2013, PLN submitted a written records request under the FOIA to
 13 ICE's FOIA office. *See Exhibit A, FOIA request.* The request was sent via U.S. Postal Service
 14 Certified Mail, Return Receipt Requested. *See Ex. B.* The request sought eight categories of
 15 records related to any ICE immigration detention facilities in Washington that are operated by
 16 The Geo Group, Inc. ("Geo"), an entity contracted by ICE to operate such facilities. They are:

- 17 • All contracts for the provision of telephone services to inmates;
- 18 • Records documenting all commissions or similar fees consisting of a
 percentage of the revenue generated by inmate phone calls, or related to
 inmate phone services, that were paid to Geo pursuant to its contract(s)
 with inmate phone service providers;
- 19 • All written policies or other records documenting, authorizing, limiting
 or describing how the inmate phone service commission payments are to
 be used;
- 20 • All records showing the results of any audits by any agency of Geo's
 inmate phone services or of the commission payments received pursuant
 to its inmate phone service contract(s);
- 21 • All records indicating the rates for telephone calls made by inmates for
 all types of calls and all payment methods;

- 1 • All records documenting any additional fees associated with inmate
- 2 phone services that are charged to inmates or recipients of calls from
- 3 inmates;
- 4 • The written institutional policy or policies that govern the receipt and
- 5 sending of mail by inmates; and
- 6 • The written institutional policy or policies that govern prisoner visits.

7 14. The requested records will be used in PLN's reporting for the public benefit.

8 PLN is the first organization to collect and compile the telephone contracts from all 50 states,
 9 and publishes its findings in PLN. The release of the requested records would allow PLN to
 10 continue to produce coverage that will contribute significantly to the public's understanding of
 11 the telephone rates charged by prisons and jails across the nation, and the profits that prison
 12 agencies generate off those rates. PLN does not have a commercial interest in such information
 13 and will obtain no commercial benefit therefrom; PLN is a non-commercial use requester.

14 15. As a news media organization seeking records in the public interest, PLN
 15 requested a waiver of duplication costs pursuant to 5 U.S.C. § 552 (a)(4)(A)(ii)(II) and 5 U.S.C.
 16 § 552 (a)(4)(A)(iii). *See* Ex. A.

17 16. ICE's FOIA officer received and signed PLN's request on August 5, 2013. *See*
 18 Ex. C. ICE failed to respond to PLN's July 30, 2013, letter.

19 17. On December 21, 2013, HRDC/PLN Staff Attorney Robert Jack sent a second
 20 letter via U.S. Certified Mail, Return Receipt Requested to ICE's FOIA Officer. *See* Exs. D, E.
 21 The follow-up letter explained PLN's original letter and the FOIA's required response
 22 deadline. It specifically requested a final response determination letter within twenty days.
 23 ICE received and signed for this letter on December 30, 2013. *See* Ex. F.

24 18. The FOIA requires any agency that receives a request under its provisions to,
 25 within 20 days of receiving the request: (1) determine whether the agency will comply with the

1 request and (2) notify the requester of its determination, its reasoning, and of requesters' right
2 to appeal denials. 5 U.S.C. § 552(a)(6)(A)(i). Here, ICE failed to meet its deadline to respond
3 to PLN's FOIA request.

4 19. To date, ICE has never responded to either the original FOIA request or the
5 follow-up letter from HRDC's counsel. ICE has failed to even correspond with PLN about its
6 FOIA request, let alone provide a determination as required by the Act.

7 **IV. CAUSE OF ACTION**

8 **Violation of Freedom of Information Act (FOIA)**

9 **For Failure to Disclose Responsive Records**

10 20. Plaintiff alleges and incorporates as set forth fully herein each and every
11 allegation contained in the above paragraphs.

12 21. Defendants have violated 5 U.S.C. § 552(a)(3)(A) by failing to promptly release
13 agency records in response to the FOIA request detailed above. Refusal to provide this
14 information is unlawful.

15 22. Defendants have violated 5 U.S.C. § 552(a)(6)(A) by failing to timely respond
16 to the FOIA request detailed above. Refusal to respond to the request is unlawful.

17 23. Injunctive relief is authorized under 5 U.S.C. §552(a)(4)(B) because Defendants
18 continue to refuse to respond and improperly withholds the requested material, and do so as a
19 matter of policy or practice, in violation of the FOIA. PLN has suffered injury and will
20 continue to suffer injury from Defendants' illegal refusal to respond and provide records.

21 24. Declaratory relief is authorized under 22 U.S.C. § 2201 because an actual
22 controversy exists regarding Defendants' failure to respond and improper withholding of the
23

1 records in violation of the FOIA. An actual controversy exists because PLN contends that
2 Defendants' continuing failure to respond and to release the records violates the law.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff PLN requests that judgment be entered in its favor against the
5 Defendants, and that the Court:

6 (a) Declare that Defendants' failure to timely respond to PLN's request violates the
7 FOIA;

8 (b) Declare that Defendants' failure to disclose responsive records violates the
9 FOIA;

10 (b) Declare unlawful and enjoin Defendants' practice of failing to comply with their
11 required duties upon receipt of a properly submitted request under the FOIA;

12 (c) Order Defendants and all entities and agents, or other persons acting by,
13 through, for, or on behalf of Defendants, to conduct a prompt, reasonable search for records
14 responsive to PLN's FOIA requests, without imposing search or duplication fees pursuant to 5
15 U.S.C. § 552(a)(4)(A);

16 (d) Enjoin Defendants and all entities and agents, or other persons acting by,
17 through, for, or on behalf of Defendants, from withholding records responsive to PLN's FOIA
18 requests and order them to promptly produce the same;

19 (e) Award PLN reasonable attorneys' fees and costs pursuant to 5 U.S.C.
20 § 552(a)(4)(E) and 28 U.S.C. § 2412; and

21 (f) Grant all other such relief to PLN as the Court deems just and equitable.

1 DATED this 2nd day of April, 2014.

2
3 Davis Wright Tremaine LLP
4
5 Attorneys for Prison Legal News

6 By s/ Eric M. Stahl

7 By s/ Angela Galloway

8
9 Eric M. Stahl, WSBA #27619
10 Angela Galloway, WSBA #45330
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19 Robert Jack, *Pro Hac Vice* pending
20 Human Rights Defense Center
21 PO Box 1151
22 Lake Worth, FL 33460
23 Telephone: 561-360-2523
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lweber@humanrightsdefensecenter.org

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Attorneys for Plaintiff

EXHIBIT A



Prison Legal News

Dedicated to Protecting Human Rights

July 30, 2013

FOIA Officer
U.S. Immigration & Customs Enforcement
Freedom of Information Act Office
500 12th Street, S.W., Stop 5009
Washington, D.C. 20536-5009

RE: Public Records Act Request

Dear FOIA Officer:

On behalf of *Prison Legal News* (PLN), a monthly publication and project of the Human Rights Defense Center, and pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, I am requesting the following records from Fiscal Year (FY) 2009, 2010, 2011, 2012 and 2013:

1. All contracts for the provision of telephone services to inmates held in detention facilities operated by the Geo Group, Inc. in Washington State on behalf of Immigration and Customs enforcement.
2. Records documenting all commissions, site commissions or other similar fees consisting of a percentage of the revenue generated by inmate phone calls, or related to inmate phone services, that were paid to The Geo Group, Inc. pursuant to its contract (s) with inmate phone service providers.
3. All written policies or other records documenting, authorizing, limiting or describing how the inmate phone service commission payments are to be used (e.g., whether such payments are used for inmate programs or revert to The Geo Group, Inc. or any government agency or general fund).
4. All records showing the results of any audits, conducted by any agency, of The Geo Group, Inc.'s inmate phone services or of the commission payments received pursuant to its inmate phone service contract (s) at its immigration detention facilities in Washington state.
5. All records indicating the rates for telephone calls made by inmates from immigration detention facilities operated by The Geo Group, Inc. in Washington state for all types of calls (i.e., local, intraLATA, interLATA, interstate and international) and payment methods (i.e., collect, pre-paid collect, and debit calls, as applicable).

6. All records documenting any additional fees associated with inmate phone services that are charged to inmates or recipients of calls from inmates, such as fees to set up a prepaid account, add money to a prepaid account or cancel a prepaid account at immigration detention facilities operated by The Geo Group in Washington state.

7. The written institutional policy or policies that govern the receipt of mail (including books and magazines) and the sending of mail by inmates held in detention facilities operated by The Geo Group, Inc. in Washington state on behalf of ICE.

8. The written institutional policy or policies that govern visitation/visits to prisoners held in immigration detention facilities operated by The Geo Group, Inc. in Washington state.

Because *PLN* is a media publication and the requested records will be used for the benefit of the public through non-commercial news reporting, and will contribute significantly to public understanding of government operations and activities at The Geo Group, Inc., I request a waiver of fees under 5 U.S.C. § 552(a)(4)(A)(iii)). Please be advised that the U.S. District Court for the District of Columbia has found that *PLN* was entitled to a fee waiver in connection with FOIA requests submitted to the Bureau of Prisons. See: *PLN v. Lappin*, 436 F.Supp2d 17 (D.A.C.2006).

Further, I request that the requested records be provided in electronic media or format if they are available in that format.

If this FOIA request is denied in whole or part, please justify all denials by reference to specific FOIA exemptions with a *Vaughn* Index. We expect you to release all segregable portions of any records responsive to this request that are denied in part. *Prison Legal News* reserves the right to appeal any decision to withhold records or portions of records, or deny a waiver of fees as requested above.

I look forward to your response within 20 business days as required by FOIA. Please contact me should you require any additional information-

Thank you for your time and attention,

Sincerely,



David Ganim
Prison Legal News
Office: 561-360-2523
dganim@prisonlegalnews.org

EXHIBIT B

U.S. Postal Service™
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(Domestic Mail Only; No Insurance Coverage Provided)

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A decorative vertical border on the left side of the page, consisting of a repeating pattern of stylized characters and symbols, including a large 'W', 'E', 'S', 'N', and 'O'.



Postage	\$			
Certified Fee				
Return Receipt Fee (Endorsement Required)		\$ 5.00		
Restricted Delivery Fee (Endorsement Required)				
Total Postage & Fees				\$

Sent To FOIA Officer, U.S. Chamber of Commerce
Street, Apt. No.: 500 12th Street SW
or PO Box No. FOIA Office
City, State, ZIP+4 Washington, DC, 20536-5000

PS Form 3E00, August 2006

See Reverse for Instructions

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- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain *Return Receipt* service, please complete and attach a *Return Receipt* (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

EXHIBIT C

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Product Tracking System

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Search

Reports

Manual Entry

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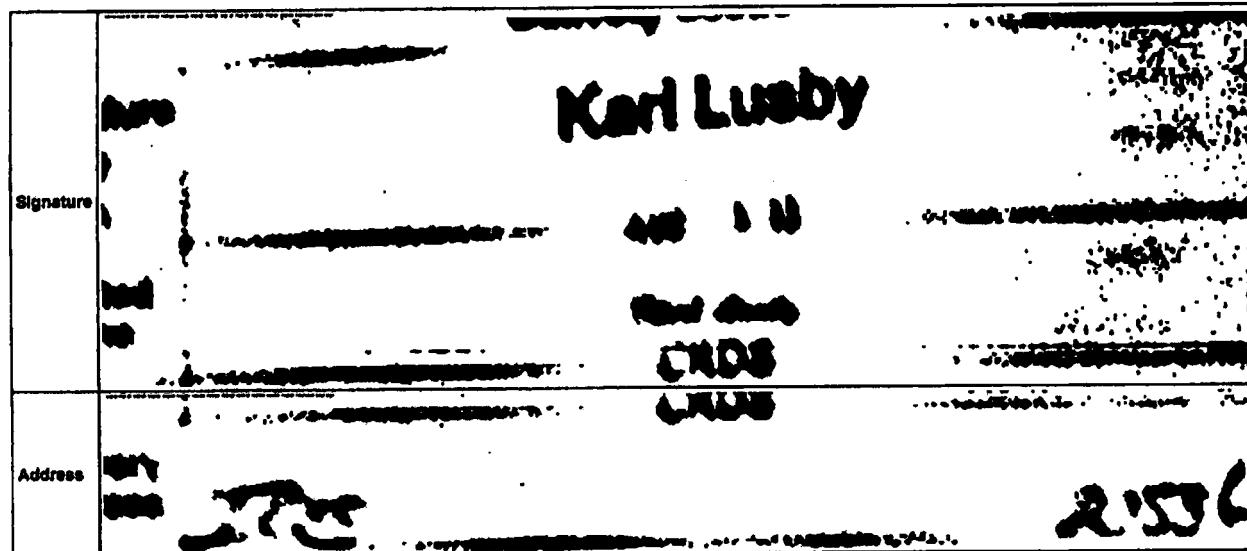
January 16, 2014

Track & Confirm Intranet

Delivery Signature and Address

Tracking Number: 7012 3460 0001 3812 8566

This item was delivered on 08/05/2013 at 06:46:00

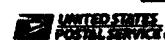
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January 15, 2014

Track & Confirm Intranet Tracking Number Result

Result for Domestic Tracking Number 7012 3460 0001 3812 8556

Destination and Origin		
Destination		
ZIP Code	City	State
20536	WASHINGTON	DC
Origin		
ZIP Code	City	State
334609998	LAKE WORTH	FL

Tracking Number Classification		
<p>Class/Service Class/Service: First-Class Certified Mail Class of Mail Code/Description: FC / First Class</p> <p>Service Delivery Information Service Performance Date: Scheduled Delivery Date: 08/02/2013 Delivery Option Indicator: 1 - Normal Delivery Zone: 05 PO Box: N Other Information: Service Calculation Information</p> <p>Payment Postage: \$0.46 Weight: 0 lb(s) 1 oz(s) Rate Indicator: Single Piece - Letters</p> <p>Other Information Firm Label ID: 5103 0SGS 5684 0002 5459</p>		

Extra Services	
Extra Services Details	
Description	Amount
Certified Mail	\$3.10
Return Receipt	\$2.56

Events							
Event	Event Date	Event Time	Location	Input Method	Scanner ID	Carrier Route	Other Information
DELIVERED	08/05/2013	08:48	WASHINGTON, DC 20536	Firm Book	0309GSE446	Scanned by route 00025010	View Delivery Signature and Address Facility Finance Number: 105010 Firm Name: ICE 20536 R19 Request Delivery Record
AVAILABLE FOR PICKUP	08/04/2013	13:33	WASHINGTON, DC 20536	Firm Book	0309GUA701	Scanned by route 25000500	
ARRIVAL AT UNIT	08/04/2013	13:17	WASHINGTON, DC 20018	Firm Book	0309GSE804	Scanned by route 00025010	
ENROUTE/PROCESSED	07/30/2013	20:56	WEST PALM BEACH, FL 33416	Scanned	DB053-008-	Destined to route 205365009	
DISPATCHED FROM SORT FACILITY	07/30/2013	20:28	WEST PALM BEACH, FL 33416	System Generated			

Event	Event Date	Event Time	Location	Input Method	Scanner ID	Carrier Route	Other Information
ENROUTE/PROCESSED	07/30/2013	20:12	WEST PALM BEACH, FL 33418	Scanned	DIOGS-001-	Destined to route 205308000	
DISPATCHED TO SORT FACILITY	07/30/2013	17:42	LAKE WORTH, FL 33460	System Generated			
ACCEPT OR PICKUP	07/30/2013	18:35	LAKE WORTH, FL 33460	Scanned	POS		Facility Finance Number: 115027

Enter up to 10 items separated by commas.

Select Search Type: Quick Search



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Version: 1.6.2.0

EXHIBIT D



Human Rights Defense Center

DEDICATED TO PROTECTING HUMAN RIGHTS

December 21, 2013

FOIA Officer
U.S. Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th Street, S.W., Stop 5009
Washington, D.C. 20536-5009

RE: FOIA Request – July 30, 2013
Via Certified Mail, Return Receipt Requested
Article No: 7013 2250 0001 8713 7056

Dear FOIA Officer,

I represent Prison Legal News (“PLN”), a publisher project of the Human Rights Defense Center. I write regarding a FOIA request with the U.S. Immigration and Customs Enforcement (“ICE”) on behalf of my client PLN and its Prison Phone Justice Director, David Ganim.

On July 30, 2013, Mr. Ganim requested documents from your office pursuant to FOIA including in pertinent part:

All contracts for the provision of telephone services to inmates held in detention facilities operated by the Geo Group, Inc. in Washington State on behalf of Immigration and Customs [E]nforcement. [Exhibit #1, Attached].

The certified letter was delivered to ICE on August 5, 2013 [Exhibit #2, USPS Tracking Confirmation and Certified Mail Receipt, Attached]. No response to Mr. Ganim’s July 30, 2013, request, now nearly 5 months old, has been received by this office. PLN and Mr. Ganim have not received any notice of whether ICE will respond, a tracking number, or a request for an extension of time as stated in 5 U.S.C. § 552(a)(7)(A); *See also* 28 C.F.R. § 16.6(a), (b), (c).

If we do not receive a final response determination letter to the above request within twenty (20) days, January 10, 2013, PLN will be compelled to pursue litigation to enforce its rights to access these requested documents.

Please address any correspondence related to this matter to my attention. Thank you in advance for your attention to and cooperation with this request.

Very Truly Yours,
HUMAN RIGHTS DEFENSE CENTER

By: 
Robert Jack
Staff Attorney

Encls.

P.O. Box 1151, Lake Worth, FL 33460
Phone: 561.360.2523 Fax: 866.735.7136
Email: rjack@humanrightsdefensecenter.org

(1)

EXHIBIT E

Ft. Laud. Main Postal Store
 - Ft. Lauderdale, Florida
 333109998
 1158540246 -0098
 12/21/2013 (800)275-8777 10:35:13 AM

Product Description	Sales Unit	Final Price
Sale Qty	Price	
WASHINGTON DC 20536 Zone-5 First-Class Mail Large Env 2.10 oz.		\$1.32
Scheduled Delivery Day: Tue 12/24/13		
Return Rcpt (Green Card)		\$2.55
@@ Certified		\$3.10
Label #: 70132250000187137056		*****
Issue PVI:		\$6.97
Total:		\$6.97

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 Change Due: -\$13.03

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Return Receipt Fee (Endorsement Required)	\$3.10
Restricted Delivery Fee (Endorsement Required)	\$0.50
Total Postage & Fees	\$

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or PO Box No.
City, State, ZIP+4
Washington, D.C. 20536-5009

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- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

EXHIBIT F

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Expected Delivery Day: Tuesday, December 24, 2013

Product & Tracking Information

Available Actions

Postal Product:	Features:	
First-Class Mail®	Certified Mail™	Return Receipt
DATE & TIME	STATUS OF ITEM	LOCATION
December 30, 2013, 6:06 am	Delivered	WASHINGTON, DC 20536
December 29, 2013, 12:31 pm	Available for Pickup	WASHINGTON, DC 20536
December 29, 2013, 12:02 pm	Available for Pickup	WASHINGTON, DC 20536
December 29, 2013, 10:37 am	Arrival at Hub	WASHINGTON, DC 20018
December 27, 2013	Depart USPS Sort Facility	WASHINGTON, DC 20018
December 27, 2013, 6:01 am	Processed through USPS Sort Facility	WASHINGTON, DC 20018
December 27, 2013, 12:27 am	Processed through USPS Sort Facility	MERRIFIELD, VA 22081
December 25, 2013	Depart USPS Sort Facility	MERRIFIELD, VA 22081
December 25, 2013, 4:47 am	Processed through USPS Sort Facility	MERRIFIELD, VA 22081
December 22, 2013	Depart USPS Sort Facility	OPA LOCKA, FL 33054
December 21, 2013, 9:55 pm	Processed at USPS Origin Sort Facility	OPA LOCKA, FL 33054
December 21, 2013, 4:59 pm	Dispatched to Sort Facility	FORT LAUDERDALE, FL 33310
December 21, 2013, 10:34 am	Acceptance	FORT LAUDERDALE, FL 33310

Track Another Package

What's your tracking (or receipt) number?

Track It

USPS.com® - USPS Tracking™

<https://tools.usps.com/go/TrackConfirmAction.action?iRef=fullpage&tL...>

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Track and Confirm Intranet

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March 26, 2014

Track & Confirm Intranet

Delivery Signature and Address

Tracking Number: 7013 2250 0001 8713 7056

This item was delivered on 12/30/2013 at 06:06:00

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Delivery Section	
Signature	Karl Lusby
Address	CRDS Dec. 20536

Enter up to 10 items separated by commas.

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